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September 17, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket Nos. 10-90, 14-58, 07-135, and CC Docket No. 01-92
Clarity Telecom LLC dba Vast Broadband Petition for Reconsideration
Notice of *Ex Parte***

Dear Ms. Dortch:

On September 13, 2018, Jim Gleason of Clarity Telecom LLC dba Vast Broadband (“Clarity” or the “Company”) and John Kuykendall and Cassandra Heyne of JSI (collectively, “Clarity Representatives”) met with Arielle Roth and Kagen Despain, Office of Commissioner Michael O’Rielly, Travis Litman, Office of Commissioner Jessica Rosenworcel, Evan Swartrauber, Office of Commissioner Brendan Carr, and Jay Schwarz, Office of Chairman Ajit Pai. The Clarity Representatives also met with the following members of the Wireline Competition Bureau (“WCB”): Alexander Minard, Suzanne Yelen, Katie King, Jesse Jachman and Christian Hoefly.

The purpose of the meetings was to discuss Clarity’s pending Petition for Reconsideration¹ of the FCC’s March 23, 2018 *R&O and NPRM*² which provided an additional \$36.5 million in Alternative Connect America Cost Model (“A-CAM”) funding for those rate-of-return carriers that elected A-CAM in 2016. Clarity’s Petition seeks additional A-CAM funding for 2,167 rural locations in the Company’s South Dakota study area that were prevented from receiving any high cost support due to an inadvertent clerical error in Clarity’s June 2015 FCC Form 477 data.

The Clarity Representatives discussed different possible ways that the FCC could accommodate the additional A-CAM funding requested in Clarity’s Petition and urged the Commissioner and WCB advisors to include a mechanism for funding Clarity’s

¹ Clarity Telecom LLC dba Vast Broadband Petition for Reconsideration, WC Docket Nos. 10-90, 14-58, 07-135, CC Docket No. 01-92, Filed May 10, 2018 (“Petition”).

² See *Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking*, WC Docket Nos. 10-90, 14-58, 07-135, CC Docket No. 01-92 (rel. March 23, 2018), FCC 18-29 (“*R&O and NPRM*”).

“abandoned” locations in the forthcoming rulemaking addressing the Universal Service Fund budget. The Clarity Representatives presented the attached materials to illustrate the challenges of deploying broadband in its study area, where only about half of the census blocks that should receive A-CAM are funded.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

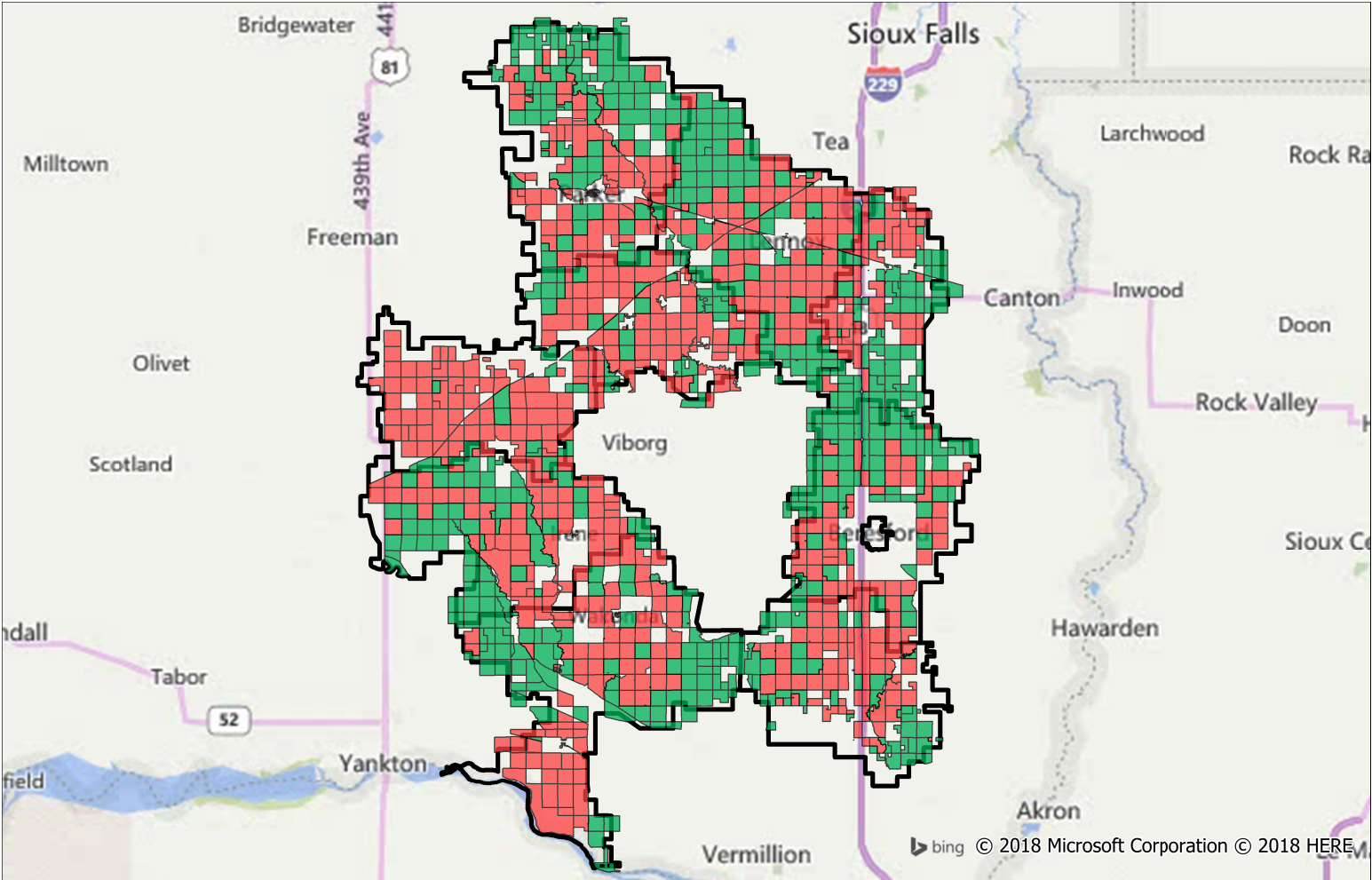
A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Jay Schwarz
Arielle Roth
Kagen Despain
Evan Swarztrauber
Travis Litman
Alexander Minard
Suzanne Yelen
Katie King
Christian Hoefly
Jesse Jachman

Attachments

GREEN - A-CAM funded Census Blocks
RED - Ineligible census blocks due to 477 error



Clarity Impact of corrected cable modem blocks on ACAM	If Waiver is Granted JSI Estimate using model info	Current ACAM per FCC release	Impact
Annual ACAM Payment	\$ 4,084,471	\$ 1,934,979	\$ 2,149,492
Fully Funded Locations	3,107	1,379	\$ 1,728
Fully Funded Locations with Obligation to Offer 25/3 Mbps	1,553	689	\$ 864
Fully Funded Locations with Obligation to Offer 10/1 Mbps	1,554	690	\$ 864
Capped Locations	880	441	\$ 439
Capped Locations with Obligation to Offer 4/1 Mbps	219	110	\$ 109
Capped Locations Remaining on Reasonable Request Standard	661	331	\$ 330